

United States Courts
Southern District of Texas
FILED

September 04, 2024

Nathan Ochsner, Clerk of Court

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

TOMILEE RAMIREZ,
Plaintiff,

V.

C.A. NO. 5:23-CV-140

MARISSA GARZA AND DESTINY GONZALEZ,
Defendants.

**PLAINTIFF'S ADVISORY TO THE COURT ON CONTINUING INTRUSION UPON
SECLUSION, HARASSMENT, AND RETALIATORY ACTIONS BY JIM HOGG COUNTY
OFFICIALS**

TO THE HONORABLE COURT:

Comes now, Plaintiff, Tomilee Ramirez, to respectfully advise this Honorable Court of ongoing and escalating intrusions upon her seclusion, harassment, and retaliatory actions being perpetrated by officials of Jim Hogg County, Texas, since the filing of her civil rights complaint and civil suit against Marissa Garza. "Pursuant to the principle established in *Marbury v. Madison*, 5 U.S. 137 (1803), any law, rule, or practice that is repugnant to the Constitution is null and void. The actions taken by Justice of the Peace Marissa Garza and other Jim Hogg County officials, which violate my constitutional rights to due process, equal protection, freedom of speech and freedom from unlawful retaliation, must therefore be declared null and void by this Honorable Court. These actions, being in direct conflict with the Constitution, cannot be upheld as lawful under any circumstances. **523 U.S. 574 (1998)** deals with the burden of proof in retaliation

claims under Section 1983, stating that the plaintiff does not need to provide clear and convincing evidence of the defendant's unconstitutional motive.

1. Plaintiff has diligently exercised her right to report the ongoing violations of her human, civil, and constitutional rights by Jim Hogg County officials to appropriate authorities, including but not limited to Internal Affairs, the Federal Bureau of Investigation Civil Rights Division, and through the continuous submission of formal complaints and reports against said officials.

2. Plaintiff asserts that these officials, whose duty is to uphold the Constitution and protect the rights of the citizenry, have instead engaged in a concerted and systematic campaign of harassment, gangstalking, and retaliatory measures against her, subsequent to the initiation of her civil action. Such actions are in direct contravention of their sworn oath of office, which obligates them to support and defend the Constitution of the United States and the State of Texas.

3. Plaintiff further contends that the aforementioned retaliatory actions are being taken not because she has committed any crime, nor because she is a criminal, but solely because she has chosen to stand up for her lawful, legal, and unalienable rights. The actions of these officials represent a willful attempt to intimidate and punish Plaintiff for asserting her rights and pursuing legal recourse against one of their employees.

4. The continuous and unlawful conduct by Jim Hogg County officials not only violates Plaintiff's rights but also constitutes a clear and egregious breach of their official duties, amounting to a war against the very Constitution they are sworn to uphold.

WHEREFORE, Plaintiff respectfully brings this matter to the Court's attention, seeking any appropriate relief the Court deems just and necessary to protect Plaintiff from further harassment and retaliation by these officials.

Respectfully submitted,

Tomilee Ramirez

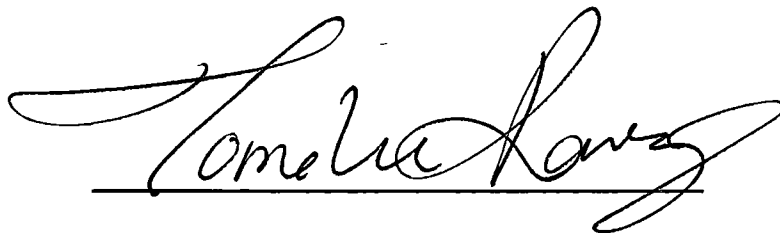
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Plaintiff, Pro Se

A handwritten signature in black ink, reading "Tomilee Ramirez", is written over a horizontal line.